

RECEIVED  
DEC 23 2019  
U.S. District Court  
Eastern District of MO

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
\_\_\_\_\_  
DIVISION

Plaintiff(s), Reginq Marie Hill  
v. Hollywood casino st. Louis  
Case No. \_\_\_\_\_  
(to be assigned by Clerk of District Court)  
JURY TRIAL DEMANDED  
YES ☐ NO ☐  
Defendant(s). (Enter above the full name(s)  
of all defendants in this lawsuit. Please  
attach additional sheets if necessary.)

EMPLOYMENT DISCRIMINATION COMPLAINT

1. This employment discrimination lawsuit is based on (check only those that apply):

X

Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000e, *et seq.*, for employment discrimination on the basis of race, color, religion, gender, or national origin.  
**NOTE:** *In order to bring suit in federal district court under Title VII, you must first obtain a right-to-sue letter from the Equal Employment Opportunity Commission.*

X

Age Discrimination in Employment Act of 1967, as amended, 29 U.S.C. §§ 621, *et seq.*, for employment discrimination on the basis of age (age 40 or older).  
**NOTE:** *In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file charges with the Equal Employment Opportunity Commission.*

X

Americans with Disabilities Act of 1990, as amended, 42 U.S.C. §§ 12101, *et seq.*, for employment discrimination on the basis of disability.  
**NOTE:** *In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a right-to-sue letter from the Equal Employment Opportunity Commission.*

Rehabilitation Act of 1973, as amended, 29 U.S.C. §§ 701, *et seq.*, for employment discrimination on the basis of a disability by an employer which constitutes a program or activity receiving federal financial assistance.

**NOTE:** *In order to bring suit in federal district court under the Rehabilitation Act of 1973, you must first file charges with the appropriate Equal Employment Office representative or agency.*

Other (Describe)

**PARTIES**

2. Plaintiff's name: Regina M. Hill

Plaintiff's address: 9865 Rivermont Dr

Street address or P.O. Box

St. Louis, Mo, 63137

City/ County/ State/ Zip Code

314-349-0400

Area code and telephone number

3. Defendant's name: Hollywood Casino St. Louis

Defendant's address: 777 Casino Center Place

Street address or P.O. Box

Maryland Heights Mo, 63043

City/County/State/ Zip Code

Area code and telephone number

**NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES, ADDRESSES AND TELEPHONE NUMBERS ON A SEPARATE SHEET OF PAPER.**

4. If you are claiming that the discriminatory conduct occurred at a different location, please provide the following information:

(Street Address) (City/County) (State) (Zip Code)

5. When did the discrimination occur? Please give the date or time period:

Sept 3, 2019 to Sept 6, 2019

**ADMINISTRATIVE PROCEDURES**

6. Did you file a charge of discrimination against the defendant(s) with the Missouri Commission on Human Rights?

☒ Yes Date filed: Sept 25, 2019  
☐ No

7. Did you file a charge of discrimination against the defendant(s) with the Equal Employment Opportunity Commission or other federal agency?

☒ Yes Date filed: Sept 25, 2019  
☐ No

8. Have you received a Notice of Right-to-Sue Letter?

☒ Yes ☐ No

If yes, please attach a copy of the letter to this complaint.

9. If you are claiming age discrimination, check one of the following:

☒ 60 days or more have passed since I filed my charge of age discrimination with the Equal Employment Opportunity Commission.

☐ fewer than 60 days have passed since I filed my charge of age discrimination with the Equal Employment Opportunity Commission.

NATURE OF THE CASE

10. The conduct complained of in this lawsuit involves (check only those that apply):

- ☒ failure to hire me
- ☒ termination of my employment
- ☐ failure to promote me
- ☐ failure to accommodate my disability
- ☐ terms and conditions of my employment differ from those of similar employees
- ☒ retaliation
- ☐ harassment
- ☐ other conduct (specify):

Did you complain about this same conduct in your charge of discrimination?

☒ Yes

☐ No

11. I believe that I was discriminated against because of my (check all that apply):

☒ race

☐ religion

☒ national origin

☒ color

☐ gender

☐ disability

☒ age (birth year is: 1975)

☐ other:

Did you state the same reason(s) in your charge of discrimination?

☐ Yes

☐ No

12. State here, as briefly and clearly as possible, the essential facts of your claim. Describe specifically the conduct that you believe is discriminatory and describe how each defendant is involved in the conduct. Take time to organize your statement; you may use numbered paragraphs if you find it helpful. It is not necessary to make legal arguments, or to cite cases or statutes.

I applied for a surveillance position Aug of 2019, I called to check the status of my application. But after the human resources operator heard my voice she told me in a rude way Jason would call me back. Later the criminal position was filled. But it was not, I did call the vice president office to let them know I did not feel I was being treated fairly. I was offered the slot pg position on the phone, I kept trying to get back in contact with Jason, but people kept making fun & laughing at me & hanging up. After Jason & I spoke, he asked me could I get to work, I said yes on the bus. He began to check the bus schedule rather than offering me that job at that time.



me the job in that he offer me dish washing housekeeping  
 Once I said I was Puerto Rican, I needed a job so I  
 agreed to an interview. I actually got hired on the  
 interview. I met Lauren the Human Resource lady over the  
 phone who kept hangy up, was rude, she kept on  
 asking about my citizenship, letting me know I  
 have to take a drug test, she claimed I had 48 hours  
 but she give me less time which expired at 2:00 am,  
 when I got to the site I noticed it experience, she asked  
 me to tell me, she said they would send new paper-  
 work over. For the test they never did,

I called my supervisor & the vice president  
 but the next dg on sept 6, 2019 they  
 responded me applian claiming I did not  
 take the drug test,

(Attach additional sheets as necessary).

13. The acts set forth in paragraph 12 of this complaint:

☐ are still being committed by the defendant.

☐ are no longer being committed by the defendant.

☒ may still be being committed by the defendant.

**REQUEST FOR RELIEF**

State briefly and exactly what you want the Court to do for you. Make no legal arguments;

cite no cases or statutes.

*I want to file the lawsuit, I want justice, so no one will ever be judged off of age, disability, race and I feel I should have not been told I could not work,*

14. Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 23 day of Monday, 2019.

Signature of Plaintiff Regina Marie Hester